
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

USG Interiors, Inc.
27384 Highway 61 Boulevard
Red Wing, Minnesota 55066

ATTENTION:

Environmental Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring USG Interiors, Inc. (USG or you) to submit certain information about USG's facility at 27384 Highway 61 Boulevard, Red Wing, Minnesota. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B, specifies the information that you must submit. You must send this information to us according to the schedule specified in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

USG owns and operates an emission source at the Red Wing, Minnesota facility. We are requesting this information to determine whether your emissions source is complying with the Minnesota State Implementation Plan, applicable CAA regulations, and the National Ambient Air Quality Standards.

USG must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

USG must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

As more fully explained in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject USG to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Daniel Schaufelberger at (312) 886-6814.

Date

7/30/15


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B through Appendix D.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document or electronically stored information (ESI) produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents, ESI, or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents, ESI, or information are not available or in your possession and identify any source that either possesses or is likely to possess the documents, ESI, or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents or ESI responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents or ESI in Portable Document Format (PDF) or similar format; unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document or ESI to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive, or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to the response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents or ESI claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix E for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

DEFINITIONS

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.* Reference is made to EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term "ESI" or "electronically stored information" includes any type of information that is stored in an electronic form and includes but is not limited to e-mails, web pages, word processing files, spreadsheets, PowerPoint presentations, audio and video files, databases, and metadata, etc. ESI may be stored in the memory of computers, magnetic disks (such as computer hard drives and floppy disks), optical disks (such as DVDs and CDs), flash memory (such as "thumb" or "flash" drives), and may include ESI located on network drives (including F, G, and H drives), your work desktops, laptops, home computers, and PDAs (e.g., Blackberrys and smart phones), any punch card, disc or disc pack, zip disk, I-pod, digital media player, portable media player, portable hard drive, USB storage device, or other type of portable electronic storage media; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written or electronic material necessary to use such punch card, disc, or disc pack, tape, CD/DVD, zip disk, flash drive, floppy disk, I-

pod, digital media player, portable media player, portable hard drive, USB storage device, or other type of portable electronic storage media, together with printouts of such punch card, disc, or disc pack, tape or other type of memory).

3. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

USG Interiors, Inc. (USG) must submit the following information requested for its facility located at 27384 Highway 61 Boulevard, Red Wing, Minnesota (the Facility), pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. Section 7414(a), within *twenty (20) calendar days* from receipt of this request.

1. Provide the actual annual emissions for the Facility reported to Minnesota Pollution Control Agency (MPCA) for the years 2010 to the year of the most recent submittal. Provide the method for the annual emission calculations, including the basis of any emission factors used, and a copy of the reports.
2. Provide a list of all approved capital expenditures greater than \$25,000 for equipment/operations directly or indirectly related to product manufacturing and for which construction commenced from January 1, 2010 through the date of receipt of this request. This list should identify, for each project: the construction initiation and completion dates; and a comprehensive description of the project including the purpose, justification, and intended outcome. For each project included on this list, provide copies of: (a) each capital appropriation request (CAR), capital project request (CPR), authorizations, or requests for expenditures for the project; (b) any attachments or addendums to a CAR or CPR (or similar documents) that discusses the justification for the project; (c) any application(s) for a construction permit(s) submitted to MPCA; and (d) any construction permits issued by MPCA for the project(s).
3. Provide, for each cupola (Cupola #1 and Cupola #2) at the Facility an electronic (Microsoft Excel compatible) copy of the following information from January 1, 2010 to the most recent month: (a) the actual monthly coke usage (tons/month); (b) average coke heat content (MMBtu/lb); (c) the quantity of each raw material charged (tons/month); (d) the quantity of mineral wool produced (tons/month); and (e) the average sulfur content of the coke, raw materials, and mineral wool product (wt%).
4. Provide a list and copies of each emissions test conducted for any reason, from January 1, 2010 to the date of receipt of this request. Emissions testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guideline for compiling the list and preparing copies of the stack tests:
 - a. **List:** Identify the emissions unit(s) tested, the date of each test, the purpose of each test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with MPCA.
 - b. **Copies:** A copy of the summary pages from each report is sufficient, provided that the summary provides emission rates as well as all the operating parameters recorded during the tests.

Appendix C

Confidential Business and Personal Privacy Information Assertion Requirements

You may assert a business confidentiality claim covering any part of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emissions data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emissions data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B), and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the CAA, and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and that disclosure of the information is likely to cause substantial harm to your business' competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in the answer to question 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to its detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for this assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. If there any other information you deem relevant to EPA's determination regarding its claim of business confidentiality?

If you receive a request for a substantiation letter from EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate personnel, medical, and similar files from the responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

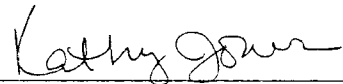
I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Environmental Manager
USG Interiors, Inc.
27384 Highway 61 Boulevard
Red Wing, Minnesota 55066

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Katie Koelfgen
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155-4194

on the 3rd day of September 2015.


for Loretta Shaffer
Technician Program
AECAB, PAS

Certified Mail Receipt Number: 7014 2870 0001 9580 4596